

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CURLY YOUNG,	:	
	:	
Plaintiff,	:	
	:	CASE NO:
vs.	:	
	:	1:06-CV-00563-SRW
HONEYWELL TECHNOLOGY SOLUTIONS, INC.,	:	
	:	
Defendant.	:	
	:	

JOINT MOTION FOR EXTENSION OF PRE-TRIAL DEADLINES

COME NOW Plaintiff Curley Young (“Plaintiff”) and Defendant Honeywell Technology Solutions, Inc. (“Honeywell”) (collectively the “Parties”) and move this Court for an extension of the remaining pre-trial deadlines in this matter. In support hereof, the Parties state as follows:

1. Honeywell filed its Motion for Summary Judgment, Brief in Support, and Evidentiary Submission on May 1, 2007. Plaintiff filed his Opposition on May 21, 2007, and Honeywell filed its Reply on June 1, 2007. The undersigned have not received any decision from the Court regarding the Summary Judgment Motion.

2. The Court’s Scheduling Order requires that on or before August 10, 2007, that the Parties exchange the names and addresses of all witnesses. The Scheduling Order also requires that by August 17, 2007, the Parties to identify deposition transcript excerpts and other documents the Party expects to use at trial. Adverse parties are then provided until August 24, 2007. to identify responsive parts of depositions expected to be

used, and until August 27, 2007, to identify any rebuttal thereto. Additionally, on or by August 17, 2007, the Scheduling Order requires that the Parties make available to opposing counsel all exhibits or tangible evidence to be used at trial. Written objections are then due on August 24, 2007.

3. The Parties proposed Pre-Trial Order is due on August 28, 2007.

4. In an effort to conserve costs and resources, the Parties would like to wait until the Court issues an Order with respect to the Summary Judgment Motion before expending the time and money required to comply with the above-mentioned pre-trial deadlines.

5. Therefore, in order to allow adequate time for the Court to consider the Summary Judgment Motion, the Parties propose that the Court extend all pre-trial deadlines until August 28, 2007, the date of the pre-trial order.

WHEREFORE, PREMISES CONSIDERED the Parties respectfully request that this Court extend all remaining pre-trial deadlines as set forth in the Court's Uniform Scheduling Order until August 28, 2007.

THIS WILL CERTIFY THAT ALL PARTIES HAVE AGREED TO THE ABOVE AND HAVE AGREED THAT:

Ryan M. Aday will e-file the foregoing Joint Motion and Proposed Order. Specifically, the above is agreed to by:

/s/ Jeffrey W. Bennett
Jeffrey W. Bennett
Jeffrey W. Bennett & Associates
4889 Valleydale Road, Ste. A3
Birmingham, Alabama 35242
Phone: (205) 408-7240
Facsimile: (205) 408-9236
E-Mail: bennittlaw@aol.com

Attorney for Plaintiff

/s/Ryan M. Aday
Sandra B. Reiss (ASB-3650-s80s)
Ryan M. Aday (ASB-3789-a54a)
**Ogletree, Deakins, Nash,
Smoak & Stewart, P.C.**
One Federal Place, Suite 1000
1819 Fifth Avenue North
Birmingham, Alabama 35203
Telephone: (205) 328-1900
Facsimile: (205) 328-6000
E-Mail: sandra.reiss@odnss.com
ryan.aday@odnss.com

Attorneys for Defendant

5100554.1